(common frame) located in a collocation common area. This method provides a CLEC an option of connecting UNEs that do not require connection to CLEC equipment in the collocation space. All physically collocated CLECs choosing Method 2 in an office will have access to the same access point. (STC Appendix UNE 2.9.1.2)

88. (Method 3) SWBT will extend UNEs that require cross connection to a CLEC UNE Frame located in a common area room space, other than collocation common area, within the central office or tandem office building. The CLEC point of access will be located in a secure area of the building other than the collocation space. This will allow CLECs to share a common frame for the connection of SWBT UNEs. The CLEC will not have access to its own equipment from this point. (STC Appendix UNE 2.9.1.3)

89. (Method 4) SWBT will extend UNEs to an external Point of Presence, such as a cabinet located outside the central office or tandem office building, provided by SWBT on SWBT property. This arrangement will operate like Method 3, except the point of access will be outside of the SWBT building. (STC Appendix UNE 2.9.1.4)

90. (Method 5) SWBT will allow extension of UNEs to a building not controlled by SWBT via cabling provided by CLEC. The CLEC will provide the cable necessary to reach from a manhole outside the central office building to the SWBT Distribution Frame in the SWBT central office where the CLEC requests connection. (STC Appendix UNE 2.9.1.5)

91. The terms and conditions for CLECs choosing to access SWBT UNEs through physical collocation arrangements are set forth in Appendix PC. (STC Appendix UNE 2.9.2.1)

92. Methods 1 and 2, listed above, are only available to physically collocated CLECs. (STC Appendix UNE 2.9.2.2)

93. Methods 3 through 5 are available to both collocated and non-collocated CLECs and are subject to the availability of space and equipment as determined by SWBT. (STC Appendix UNE 2.9.2.3)

Cross-connections

94. Cross-Connections are the facility by which SWBT will extend its network to the point of access selected by a CLEC, as discussed above. The FCC's Order required incumbent LECs to provide such facilities and stated that the LEC could recover the cost associated with providing cross- connections. Using cross connections in this manner is currently being done by SWBT in GTE territory and is a proven method of interconnection.

95. The cross-connect is the media between the SWBT distribution frame and a CLEC designated point of access. (STC Appendix UNE Sec. 11.1; ACS, Cox and !nterprise Appendix UNE Sec. XI.A; AT&T, Dobson and Sprint Attachment UNE Sec. 11.1)

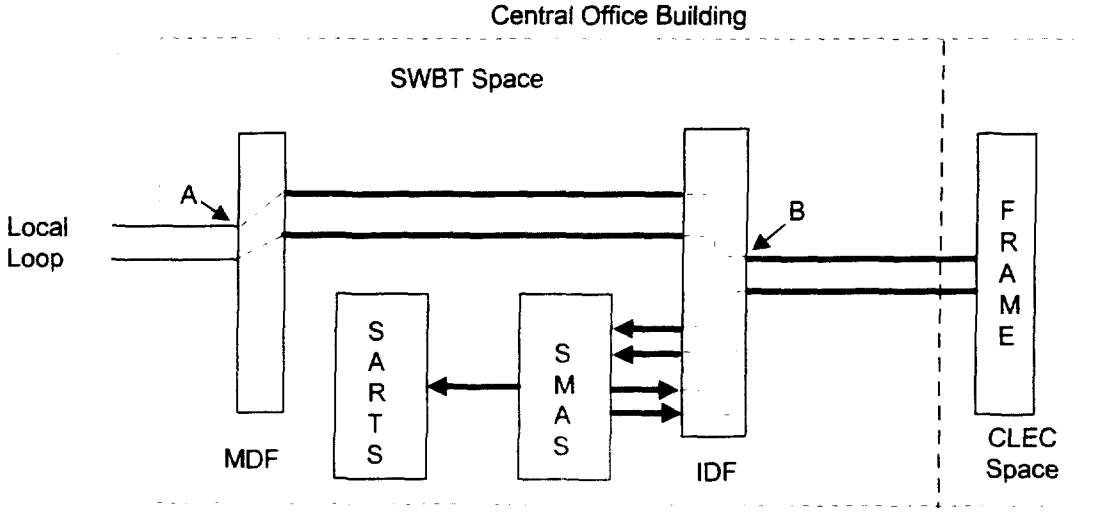
96. Cross-connections are wires or fibers or equipment that connect one piece of equipment to another on a semi-permanent basis. For instance, some cross-connections are made by a simple pair of copper wires called a jumper.

97. Different loop options require different types of cross-connections. In fact several cross-connections may be required for many of the options. SWBT offers the following types of loop cross-connects:

- Analog loop to point of access
- Digital loop to point of access

98. Each of the above cross-connections are offered on a 2-wire and 4-wire basis. (STC Appendix UNE Sec. 11.2; ACS, Cox and Interprise Appendix UNE Sec. XI.B; AT&T, Dobson and Sprint Attachment UNE Sec. 11.2)

99. The 2-wire analog loops require the simplest cross-connections. If a single pair of copper wires are to be connected to a CLEC's collocation equipment, it will be necessary to cross-connect the local loop from the SWBT Main Distribution Frame (MDF) to a set of test access points and then to a tie cable connecting to the LSP collocation equipment, or point of access. The following diagram shows this arrangement.



SMAS = Switched Maintenance Access System
SARTS = Switched Access Remote Testing System
MDF = Main Distribution Frame
IDF = Intermediate Distribution Frame

100. The analog local loop is terminated on the main distribution frame. A cable connects the MDF to an Intermediate Distribution Frame ("IDF) where the SMAS test access points are also terminated. A series of two wire jumpers, consisting of pairs of copper wires are placed to connect the local loop on the MDF to the IDF then to the input SMAS test points located on the IDF. A final jumper connects the SMAS output test point on the IDF to a

pair of the copper cable that terminates on the frame in the CLEC collocation area or point of access. These individual jumpers are shown as dotted lines in the above diagram.

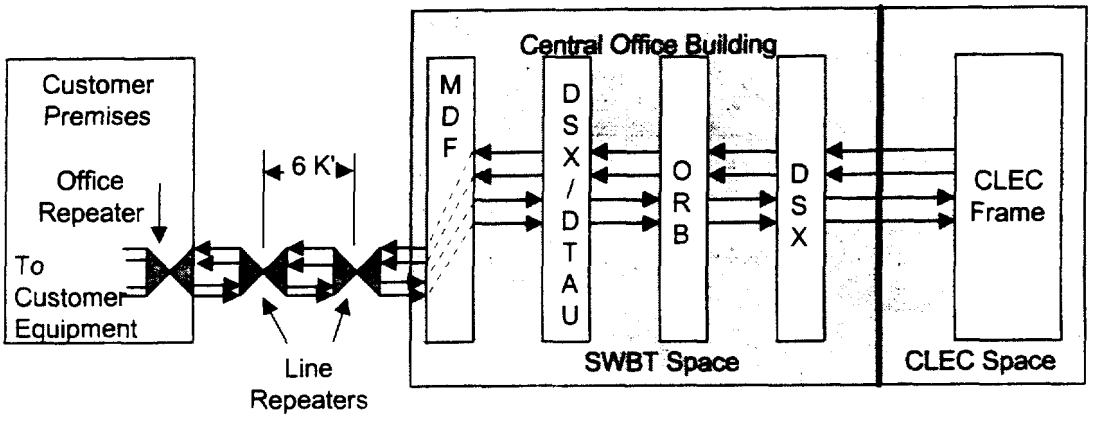
101. When SWBT provides an unbundled local loop, it is necessary to provide test access points by using the SMAS test points. The SMAS test points allow a SWBT test system (SARTS) to access the loop, separate the loop and the connection to the collocation equipment, and perform transmission test from a remote location, just as is done on loops that serve SWBT customers. This testing access is necessary for SWBT to be able to provide comparable levels of maintenance and repair services on loops serving the CLEC's customers to the levels SWBT achieves on loops serving its own customers. The requirement for the presence of test access was a contested issue in the AT&T arbitration case in Oklahoma. (PUD 96000213) SWBT presented the need for the test access points and AT&T challenged the need for the test access points. The Oklahoma Commission ordered SWBT to provide local loops as an unbundled network element and did not eliminate the requirement for test access points.

102. A 4-wire analog loop cross connection to the collocation cage, or point of access, requires the same arrangement as the 2-wire circuit described above. However, it requires a 4-wire SMAS test points instead of the 2-wire SMAS test point and twice the number of jumpers.

103. The arrangement required to cross-connect a 2-wire digital loop to the point of access is the same as required for the 2-wire analog loop.

104. The 4-wire digital loop circuit from the customer's premises terminates on the MDF. A special shielded wire is used as a cross-connection jumper to a SWBT digital cross-connect panel ("DSX"). The circuit is connected by a jumper to an office repeater, if necessary,

and then to a DSX dedicated to the CLEC. A jumper is used to connect to shielded cable that is terminated in the CLEC's collocation space or point of access. The following diagram illustrates this arrangement.



105. These cross connections are the same type of connections that are used by SWBT to connect local loops to equipment located in a central office building. They will be placed using the same jumper wires, cables and other materials as is used by SWBT for its customers. The same methods and procedures will be used by SWBT's technicians to place the cross connections as are used when cross connecting loops used by SWBT customers to equipment in the central office. SWBT technicians have a demonstrated ability to place thousands of cross connections every day in the provisioning of telecommunications services. As discussed later, any deficiencies in the quality of the cross connections will be easily detectable by the CLEC's testing of the loop facilities.

106. The same types of cross connections that are provided to connect loops to the collocation cage may be used to extend switch ports to the point of access. This will allow a CLEC to connect the unbundled network elements.

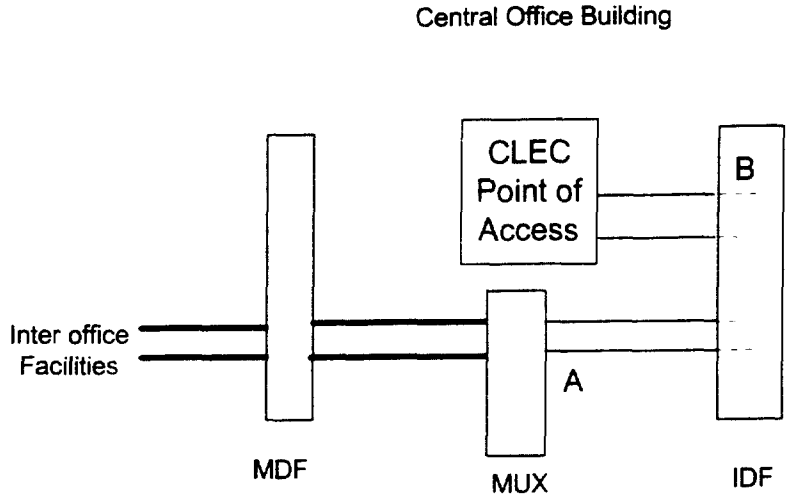
107. Cross-connections must also be used with Unbundled Dedicated Transport ("UDT"). The following cross-connects are available with UDT:

- Voice Grade 2-Wire
- Voice Grade 4-Wire
- DS0-DCS to point of access
- DS1
- DS3
- OC3
- OC12
- OC48

(STC Appendix UNE Sec. 11.3.3; ACS and Cox Appendix UNE Sec. XI.C.3; AT&T, Dobson and Sprint Attachment UNE Sec. 11.3; Interprise Appendix UNE Sec. XI.D.3)

108. The dedicated transport cross-connects are the equipment needed to connect the interoffice dedicated transport transmission facilities to the point of access.

109. The 2-wire voice grade dedicated transport cross-connect is designed to provide the equipment needed to multiplex the 2-wire circuit onto a DS1 circuit for interoffice transport. The following diagram shows this arrangement. The cross connect includes the 2-wire circuit pack in the multiplexer at point A, the cable to the IDF, and the jumper on the IDF to the cable to the point of access at point B.



110. The 4-wire dedicated transport cross-connect requires twice the jumpers and a different multiplex card.

111. The DS1 dedicated transport cross-connect arrangement is identical to that used to cross connect to the collocation cage except for the final jumper. Instead of connecting to a DSX dedicated to the LSP, the jumper is connected to a DSX connected to the SWBT multiplexing equipment.

112. Since the DS3 entrance facility is a fiber-based facility, it includes the necessary electronics for connecting to a DS3 DSX. The entrance facility is then cross-connected to a DSX connected to the dedicated interoffice equipment.

113. Like the loop cross connections, these connections will be made with the same materials and by the same technicians that today accurately place the same type of cross connections for SWBT customers.

VII. CHECKLIST ITEM (vii): 911/E911, DIRECTORY ASSISTANCE AND OPERATOR CALL COMPLETION

911 and E911 Services

114. Checklist item (vii) (I) requires that SWBT provide nondiscriminatory access to 911 and E911 Services. 47 U.S.C. § 271(c)(2)(B)(vii)(I) SWBT satisfies this requirement. (STC Appendix 911)

115. Access to 911 and E911 services is provided through existing tariffs to local government bodies in Oklahoma. SWBT will provide customers of CLECs with access to the type of 911 service selected by the governmental body of the area in which they reside in a manner identical to the 911 service supplied to SWBT's own customers. A CLEC may provide 911 access service directly to the governmental body, or may interconnect to SWBT's existing service arrangement, at the request of the governmental body. (ACS, Brooks, Cox, ICG, Intermedia, Interprise and USLD Appendix 911; AT&T, Dobson and Sprint Attachment 911/E911)

116. SWBT will provide and maintain equipment at the E911 Control Office and the Database Management System as necessary to perform E911 services for the requesting local E911 customer. This will include some or all of the following, as needed:

- Transporting the E911 calls from the CLEC's switches to the Control Office of the E911 system
- Switching the E911 calls through the Control Office to the Public Safety answering Point
- Storing the names, addresses and associated telephone numbers from the CLEC's customers in electronic databases for the E911 Database Management System

- Transmission of the information associated with the CLEC's customers to the Public Safety Answering Point upon the customer calling 911

(STC Appendix 911 Sec. II.A; Brooks, ICG and USLD Appendix 911 Sec. II.A; AT&T, Dobson and Sprint Attachment 911/E911 Sec. 2.0)

117. SWBT will provide and maintain sufficient dedicated E911 circuits according to provisions of the E911 tariff and specifications of the E911 customer. SWBT will also provide the CLEC a description of the geographic area and Public Safety Answering Points served by the E911 Control Office. (STC Appendix 911 Sec. II.B and II.C; Brooks, ICG and USLD Appendix 911 Sec. II.B and II.C; AT&T, Dobson and Sprint Attachment 911/E911 Sec. 2.2-2.3) Since 911 call traffic is often quite peaked, the most important factor in determining the number of trunks required from a central office to a 911 control office is the number of calls originated and blocked. This data for proper sizing of 911 trunk groups can only be collected in the originating central office switch. Therefore, the CLEC must collect the traffic data and determine the proper number of trunks for 911 service.

118. SWBT's STC recognizes the authority of the E911 customer to establish service specifications and grant final approval of service configurations offered by SWBT and the CLECs. (STC Appendix 911 Sec. VI.A)

119. SWBT will provide all necessary street address information for the exchanges or communities where the CLEC will operate, in order to allow the CLEC to create the necessary customer files for E911 Automatic Location Identification. SWBT will also provide the CLEC with all necessary documentation for the operation of the local E911 system and the methods of downloading and maintaining files of end user records. (STC Appendix 911 Sec. II; ACS Appendix 911 Page 3; Cox, Intermedia and !nterprise

120. Customer data for 911 service is stored in several databases that work together to provide 911 service. The combined databases are often referred to as the 911 database. The 911 database contains the information associated with each end-user customer and is created and updated by each telephone service provider. The database is the source of information about end-user customers (telephone number, name, address, class of service) needed for E911 purposes. All of the customer-specific information in the 911 database is proprietary and confidential (to different degrees for published vs. non-published accounts) under various federal laws, FCC rules and state commission rules.

121. The MSAG Database (Master Street Address Guide) is stored in the DBMS (Database Management System). MSAG defines the geographic boundaries of public safety jurisdictions and is the criteria for routing of 911 calls to an initial Public Safety Answering Point (PSAP). The MSAG also identifies the responding agencies for law, fire and EMS (emergency medical service) through the use of Emergency Service Numbers ("ESNs") assigned by the authorized 911 service customer. The responsibility for creating and updating the MSAG is set forth in SWBT's General Exchange Tariffs in each state as well as a contract executed with SWBT by each 911 customer that orders E911 services.

122. The DBMS software programs are specifically designed to process the files downloaded from the telephone service providers by matching the service address in the record of each end-user with the valid addresses in the MSAG.

123. There are two separate databases produced from the DBMS process:

- The SR Database (Selective Routing) produced by DBMS contains a record for each active telephone number in service for an end-user served by a SWBT 911 control

office. Using criteria specified by the 911 customer in the MSAG, the DBMS assigns the ESN and creates/updates the SR database stored in each of the 911 control offices. DBMS correlates the SR database files to assure each 911 control office switch contains all of the telephone numbers working in the exchanges connected to that 911 control office. The 911 control office uses its copy of the SR table to execute the selective routing of 911 calls as they occur.

- The ALI Database (Automatic Location Identification) is also produced by DBMS and contains a record for each active telephone number in service. DBMS creates each ALI record by combining information from two sources. Specific information about each end-user customer that is downloaded and maintained by each telephone service provider is combined with information from MSAG that is maintained by the 911 service customer.

124. SWBT considers the MSAG to be the 911 service customer's database and SWBT to be the custodian of that database. SWBT's use of the MSAG is limited to purposes associated with provisioning 911 service. SWBT's 911 interconnection methods and procedures include a means of providing each CLEC with a mechanized copy of the MSAG for the geographic areas the CLEC will serve. This will make the administration of MSAG more efficient for the 911 customer and the CLEC and will reduce the potential for error by maintaining one mechanized MSAG under the control of the 911 customer and utilized by all service providers who interconnect with the E911 systems provided by SWBT.

125. The ALI database is produced for the sole and specific purpose of 911 service, and it is created using proprietary information about end-users of the telephone service providers. The ALI database merely accommodates the display of that information at the PSAP for each 911 call, on a per-call basis.

126. SWBT assures the confidentiality of proprietary information about the CLEC's customers when these records are in SWBT's 911 computer systems by strictly limiting the number

of people who have access to this information. The only SWBT employees who work with the DBMS are those who specifically support 911 services. No other employees have access to the dedicated computer system where MSAG and ALI databases are stored.

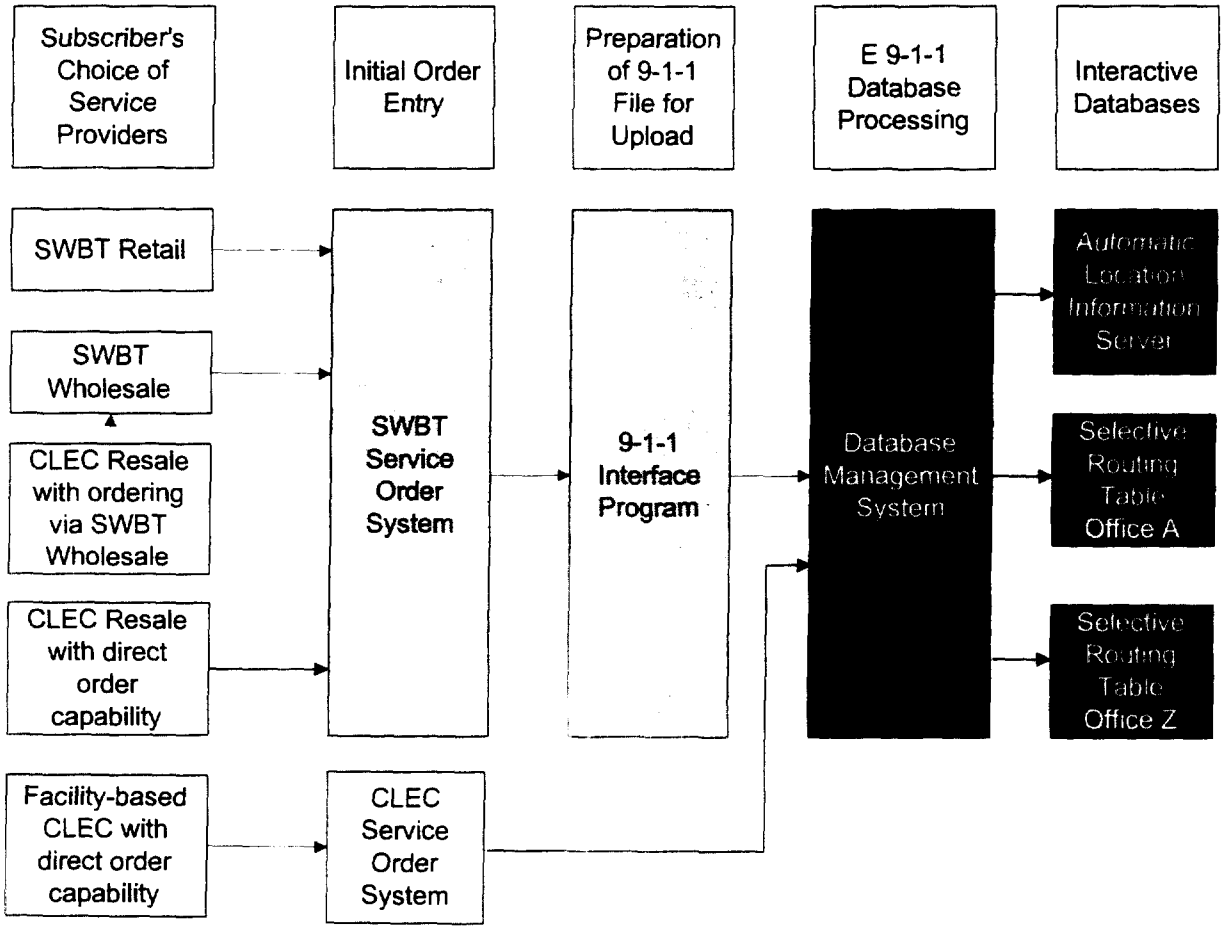
127. Detection and correction of errors in the information about the CLEC's customers when these records are in SWBT's 911 computer systems is done by SWBT in the same manner and by the same people that it is done for SWBT's customers. Each switch-based service provider is required to electronically upload and maintain the information associated with their end-users. When files containing the CLEC's customer records are uploaded, the DBMS processes the file and the CLEC receives a statistical report confirming the number of records processed and an error file with any records that failed the system edits. The error file provides codes explaining the reason each record failed to process, and the CLEC is responsible for correcting the record and resubmitting it to the DBMS. CLECs may also request a "compare" file listing all of their records in the 911 database, or a partial list for a specified geographic area, from the SWBT 911 system administrator to use in verifying that all their records are in the system. The timeliness and accuracy of these transactions are entirely dependent on the performance of the CLEC.

128. End-user records for resale providers are included in the files SWBT uploads to the DBMS for our own end-users. This can be done because the telephone service for resale end-users is initiated by the same service order entry system used to set up service for SWBT end-users, and the E911 DBMS makes no distinction between SWBT end-users and resale end-users when processing the file. If SWBT's error file contains a resale end-user record that failed edits, SWBT employees in the 911 database group correct common errors that can be resolved without issuing a service order, such as MSAG discrepancies that a

modification to the MSAG would fix. If, however, resolving the error requires issuing a service order or contacting the end-user, the error is referred to the CLEC for handling.

129. Below is a very simplified flowchart depicting the 911 database process and shows which steps share a common resource. The dark shaded processes are shared by all customers, regardless of their choice of service providers. The lightly shaded processes are shared by customers of SWBT and those CLECs that resale SWBT facilities.

E 9-1-1 Database Management System Process Flow



130. As previously mentioned, a statistical report is created for each file processed reflecting the number of records processed and the number of records that fail the edits. A review of the statistical reports for SWBT files processed in Oklahoma for the fourth quarter of 1997

showed an error rate on initial uploads of 6.40 percent. By comparison, the error percentages of the CLECs for the same period ranged from zero to 14.07 percent. It must be noted that wide variations in percentages for CLEC error rates are due to the relatively smaller number of records in the files processed. One clear conclusion that can be reached from this data on over 37,000 orders is that CLECs have demonstrated their ability to use the database management system and achieve accuracy comparable to SWBT. In fact, the two CLEC that processed records achieved a 0% error rate during this period..

131. Three CLECs in Oklahoma currently are entering data into the 911 database and obtaining the reports described above.

VIII. CHECKLIST ITEM (x): ACCESS TO DATABASES AND ASSOCIATED SIGNALING

132. The Checklist requires that SWBT provide:

> (x) Nondiscriminatory access to databases and associated signaling necessary for call routing and completion. 47 U.S.C. § 271(c)(2)(B)(x)

The FCC Rules further expand this responsibility to provide nondiscriminatory access to signaling networks and call-related databases. 47 C.F.R. § 51.319(e) SWBT's STC provides for nondiscriminatory access to its signaling networks and call-related databases used for call routing and completion. (STC Appendix UNE Sec. 9.0 and Appendices: 800, AIN, CNAM, LIDB, LIDB-V and SS7; ACS Appendices: AIN, CNAM, LIDB and LIDB-V; Cox and !nterprise Appendices: 800, AIN. CNAM, LIDB-AS, LIDB-V and SS7; Brooks, Intermedia and USLD Appendices: CNAM, LIDB, and SS7; AT&T, Dobson and Sprint Attachment UNE Sec. 9)

133. SWBT provides nondiscriminatory access to its signaling links and Signal Transfer Points ("STPs") on an unbundled basis. 47 C.F.R. § 51.319(e)(1)(i) (STC Appendix UNE Sec. 9.0 and Appendix SS7 Sec. I) SS7 Interconnection Service is available to CLECs for their use in furnishing SS7-based services to their end users or the end users of another CLEC subtending the Signaling Service Point or STP of the interconnecting CLEC. This arrangement, which is identical to the one used by SWBT itself, permits CLECs to use SWBT's SS7 signaling network for signaling between their switches, between their switches and SWBT's switches, and between their switches and the networks of other parties connected to the SWBT SS7 network. 47 C.F.R. § 51.319(e)(1)(iii) (Brooks, Cox, Intermedia, !nterprise and USLD Appendix SS7; AT&T, Dobson and USLD Attachment UNE Sec. 9.1) Three CLECs are currently connecting their switches to SWBT's SS7 network in Oklahoma.

134. When a CLEC purchases unbundled switching capability for SWBT, SWBT will provide access to its signaling network in the same manner that it provides such access to itself. Since all unbundled switching elements will be provided on switches that SWBT uses to provide service to its own customers, all signaling functions will be identical. 47 C.F.R. § 51.319 (e)(1)(ii) (STC Appendix SS7 Sec. I.A)

135. SWBT's SS7 Service is a Switched Access service which provides dedicated two-way signaling links that interconnect SWBT STP locations and the CLEC Signaling Points at Signaling Point of Interface locations. The SS7 Service consists of STP Port Termination(s) for CLEC signaling and STP Interconnection Facilities. The port terminations will consist of port connections of 56 Kilobits per second (Kb/s) transmission facilities on SWBT's STP. The STP Interconnection Facility is the facility which lies

between the multiplexing hub, which demultiplexes the CLEC's 56 kb/s transmission from DS1 transmission facilities and the STP port. These interconnection facilities may be provided by the CLEC or may be obtained from SWBT as dedicated transport facilities. 47 C.F.R. § 51.319(e)(1)(ii) (STC Appendix SS7 Sec. I.B; AT&T, Dobson and Sprint Attachment UNE Sec. 9.1; Brooks, Intermedia and USLD Appendix SS7 Sec. I; Cox and !nterprise Appendix SS7 Sec. I.B)

136. The FCC Rules identified certain call-related databases at § 51.319(e)(2)(ii). SWBT's STC provides access to its Line Information Database ("LIDB"), 800 Service Database, Calling Name Delivery Database ("CNAM"). and Advanced Intelligent Services Feature Database ("AIN"). (STC Appendices: 800, AIN, CNAM, LIDB, LIDB-V and UNE Sec. 9.0; ACS Appendices: AIN, CNAM, LIDB and LIDB-V; Cox and !nterprise Appendices: 800, AIN, CNAM, LIDB-AS and LIDB-V; Brooks, Intermedia and USLD Appendices: CNAM and LIDB; AT&T, Dobson and Sprint Attachment UNE Sec. 9) Three CLECs are currently accessing SWBT's databases.

137. SWBT allows CLECs access to its Line Information Database ("LIDB") on the same basis as it obtains access itself. Appendix LIDB of the STC sets forth the terms and conditions upon which SWBT will provide data base administration to store the CLEC's line/billing records in SWBT's LIDB. Appendix LIDB-V provides the methods and procedures to allow a CLEC to query the SWBT LIDB database. (ACS, Brooks, ICG, Intermedia and USLD Appendix LIDB; AT&T Attachment UNE Sec. 9.4; Dobson and Sprint Attachment UNE Sec. 9.3.3; Cox and !nterprise Appendices LIDB-AS and LIDB-V)

138. When a CLEC deploys its own local switching system, they will obtain access to the LIDB by using the SS7 Interconnection Service and will have access to the same functions and

features of the data base as SWBT. 47 C.F.R. § 51.319(e)(2)(iv) (STC Appendices LIDB and LIDB-V; ACS, Brooks, ICG, Intermedia and USLD Appendix LIDB; AT&T Attachment UNE Sec. 9.4; Dobson and Sprint Attachment UNE Sec. 9.3.3; Cox and !nterprise Appendices LIDB-AS and LIDB-V)

139. When a CLEC purchases unbundled local switching elements, its access to the LIDB will be identical to that of SWBT in the same switch. 47 C.F.R. § 51.319(e)(2)(iii) (STC Appendix UNE Sec. 5.1 and 9.0 and Appendix LIDB)

140. SWBT will provide access to the LIDB in accordance with the customer privacy rules of §222 of the Act. 47 C.F.R. § 51.319(e)(2)(vi). (STC Appendix LIDB-V Sec. 4; ACS Appendix LIDB-V Sec. VI; AT&T Attachment UNE Sec. 9.4.3.3; Cox and !nterprise Appendix LIDB-V Sec. 4; Dobson and Sprint Attachment UNE Sec. 9.3.3.3)

141. SWBT will provide all requesting CLECs nondiscriminatory access to its Calling Name Delivery Service Database. Calling Name Delivery ("CNAM") Service enables the terminating end-user to identify the calling party by a displayed name before the call is answered. The calling party's name, date and time of the call are retrieved from a Service Control Point ("SCP") database and delivered to the end-user's premises between the first and second ring for display on a compatible customer premise equipment. CNAM Service Query is SWBT's service that allows a CLEC to query SWBT's Calling Name database. (STC Appendix CNAM Sec. 2.0)

142. When a CLEC operates its own switching center, access to the CNAM database is obtained by SS7 Interconnection Service. The CLEC accesses the SCP through the STP in the same manner as SWBT. The same features, functions and capabilities are available to the

CLEC. 47 C.F.R. § 51.319(e)(2)(iv) (STC Appendix CNAM; ACS, Brooks, Cox, Intermedia, !nterprise and USLD Appendix CNAM; AT&T Attachment UNE Sec. 9.5; Dobson and Sprint Attachment UNE Sec. 9.3.5)

143. SWBT allows CLECs to administer their LIDB and CNAM information in the same manner that SWBT administers its own data. When a CLEC provides end user services via resale, data administration of the CLEC's customer records will be identical to SWBT's administration of SWBT's own customer records. When a CLEC provides end user services through means other than resale, that CLEC will have access to the same data administration interfaces that SWBT uses.

144. When a CLEC purchases unbundled switching elements from SWBT, the access to the CNAM database will be identical to that used by SWBT in the same switch. 47 C.F.R. § 51.319(e)(2)(iii) (STC Appendix UNE Sec. 5.1 and 9.0 and Appendix CNAM)

145. Appendix 800 to the STC provides the terms and conditions for nondiscriminatory access the SWBT's Toll Free Calling Database. Access to the Toll Free Calling Database allows a CLEC to access SWBT's 800 database for the purpose of switch query and database response. This provides the CLEC information required to determine the appropriate routing of an 800 (888) number. SWBT offers three optional features with 800 Service: Designated 10-Digit Translation, Call Validation, and Call Handling and Destination. (STC Appendix 800 Sec. I; AT&T Attachment UNE Sec. 9.6; Cox and !nterprise Appendix 800 Sec. I; Dobson and Sprint Attachment UNE Sec. 9.3.6)

146. The Designated 10-Digit Translation feature converts the 800 number into a designated 10-digit telephone number and returns this information to the sender of the query. (STC

Appendix 800 Sec. I.E.1; AT&T Attachment UNE Sec. 9.6.5.1; Cox and !nterprise Appendix 800 Sec. I.E.1; Dobson and Sprint Attachment UNE Sec. 9.3.6.5.1)

147. The Call Validation feature limits calls to an 800 number to calls originating only from an 800 Subscriber's customized service area. Calls originating outside the area will be screened and a recording will be returned to the calling party. (STC Appendix 800 Sec. I.E.2; AT&T Attachment UNE Sec. 9.6.5.2; Cox and !nterprise Appendix 800 Sec. I.E.2; Dobson and Sprint Attachment UNE Sec. 9.3.6.5.2)

148. The Call Handling and Destination feature allows routing of 800 calls based on one or any combination of the following: time of day, day of week, percent allocation and specific 10-digit automatic number identification. (STC Appendix 800 Sec. I.E.3; AT&T Attachment UNE Sec. 9.6.5.3; Cox and !nterprise Appendix 800 Sec. I.E.3; Dobson and Sprint Attachment UNE Sec. 9.3.6.5.3)

149. All of the above features are available to a CLEC and its customers in the same manner as provided by SWBT. When a CLEC operates its own switching system, access to the database will be obtained by using the SS7 Interconnection Service. 47 C.F.R. § 51.319(e)(2)(iv) (STC Appendix 800 Sec. I and Appendix SS7; AT&T Attachment UNE Sec. 9.6; Cox and !nterprise Appendix 800 Sec. I; Dobson and Sprint Attachment UNE Sec. 9.3.6)

150. When a CLEC purchases unbundled switching elements from SWBT, the access to the 800 database will be identical to that used by SWBT in the same switch. 47 C.F.R. § 51.319(e)(2)(iii) (STC Appendix 800 and Appendix UNE Sec. 5.1 and 9.0)

151. Advanced Intelligent Network ("AIN") is a vendor-independent network architecture deployed by SWBT that provides capabilities for creation of custom telecommunications services that are invoked by SS7 messages from a switch to a SCP database. In Appendix AIN of the STC, SWBT offers to provide AIN services to all CLECs. CLECs may develop AIN applications on SWBT's Integrated Service Control Point using the CLEC AIN Application Creation Service ("LAACS"). These applications can then be placed on SWBT's network. Using SWBT's CLEC AIN Access Service ("LAAS"), end-user customers of the CLEC may access SWBT-created AIN applications and/or CLEC-created AIN applications residing in SWBT's ISCP via, 1) an unbundled local switching element purchased from SWBT or, 2) CLEC's own switch that is connected to SWBT's SS7 signaling network via the SS7 network element. 47 C.F.R. § 51.319(e)(2)(iii), (iv), § 51.319(e)(3)(C) (STC Appendix AIN Sec. II; ACS, Cox and !nterprise Appendix AIN; AT&T Attachment UNE Sec. 9.7; Dobson and Sprint Attachment UNE Sec. 9.3.7)

152. SWBT provides access to the Service Management Systems ("SMS") associated with each of the databases described above in accordance with 47 C.F.R. §51.319(e)(3). Requesting carriers are provided the relevant information necessary to correctly enter, or format for entry, input into the various databases by their associated SMSs. (STC Appendices: 800, AIN, CNAM, LIDB and LIDB-V; ACS Appendices: AIN, CNAM, LIDB and LIDB-V; Cox and !nterprise Appendices: 800, AIN, CNAM, LIDB-AS and LIDB-V; Brooks, Intermedia and USLD Appendices: CNAM and LIDB; AT&T, Dobson and Sprint Attachment UNE Sec. 9)

153. All data maintained in the above databases is maintained in accordance with § 222 of the Act. (STC Appendix LIDB-V Sec. 4; ACS Appendix LIDB-V Sec. VI; AT&T Attachment

UNE Sec. 9.4.3.3; Cox and !nterprise Appendix LIDB-V Sec. 4; Dobson and Sprint Attachment UNE Sec. 9.3.3.3)

154. SWBT will respond to requests for additional arrangements for access to call-related databases and associated signaling facilities through the Bona Fide Request process.

155. In summary, as required by 47 C.F.R. § 51.319(e), SWBT provides unbundled, nondiscriminatory access to its signaling networks; to its call-related databases used in the signaling networks for billing and collection or the transmission, routing or other provisioning of telecommunications services; and to the associated SMS for each database. Each database is accessed through SWBT's STPs by a requesting CLEC in the same manner and via the same signaling links that are used by SWBT.

IX. CHECKLIST ITEM (xi): NUMBER PORTABILITY

156. Checklist item (xi) requires:

> (xi) Until the date by which the Commission issues regulations pursuant to section 251 to require number portability, interim telecommunications number portability through remote call forwarding, direct inward dialing trunks, or other comparable arrangements, with as little impairment of functioning, quality, reliability, and convenience as possible. After that date, full compliance with such regulations.

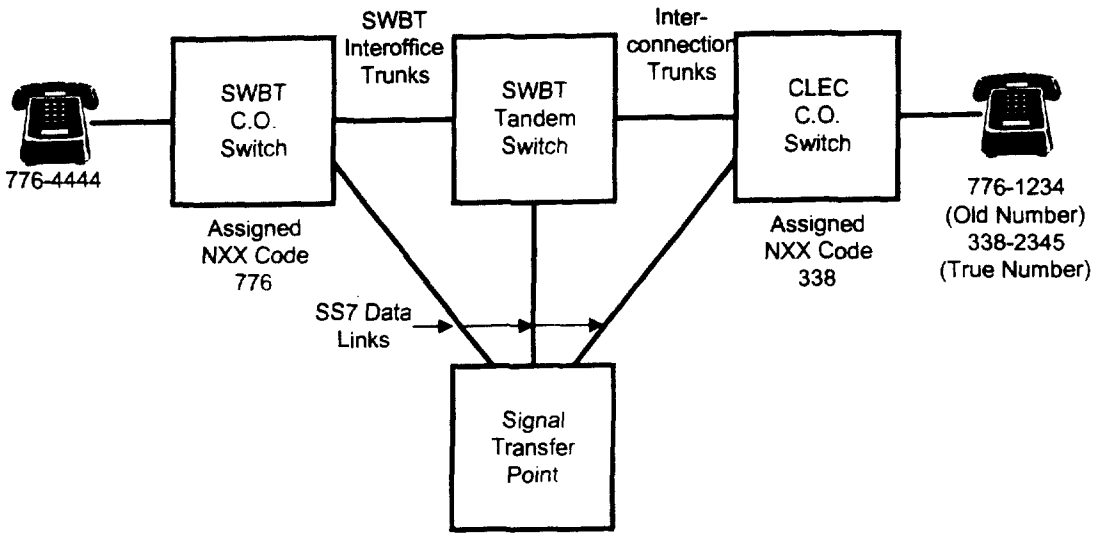
157. Local Number Portability is a service arrangement whereby an end-user who switches subscription for local exchange services from one local service provider to another is permitted to retain for its use the existing assigned telephone number, provided the end-user remains at the same location.

158. SWBT provides interim number portability to CLECs primarily through Remote Call Forwarding ("RCF"), which SWBT offers as Local Number Portability- Remote; and Direct Inward Dialing ("DID"), which SWBT offers as Local Number Portability- Direct. (STC Appendix PORT Sec. II.E and II.F) These services are offered in accordance with the FCC's Rules and the FCC's First Report and Order on Number Portability. (ACS, Brooks, Cox, Intermedia, !nterprise and USLD Appendix Port Sec. II.E; AT&T, Dobson and Sprint Attachment 14 - Interim Number Portability)

159. INP-Remote uses Remote Call Forwarding (RCF) technology. With this option, a SWBT switch receives all calls directed to a telephone number that is assigned to that switch. If the called number is equipped with the INP-Remote service option, the SWBT switch uses information in its memory to associate the new telephone number that the CLEC has assigned in its switch to the customer who used to have the called number. The SWBT switch then sends the call with the new telephone number to the CLEC switch. The CLEC switch uses the new number to complete the call to the customer.

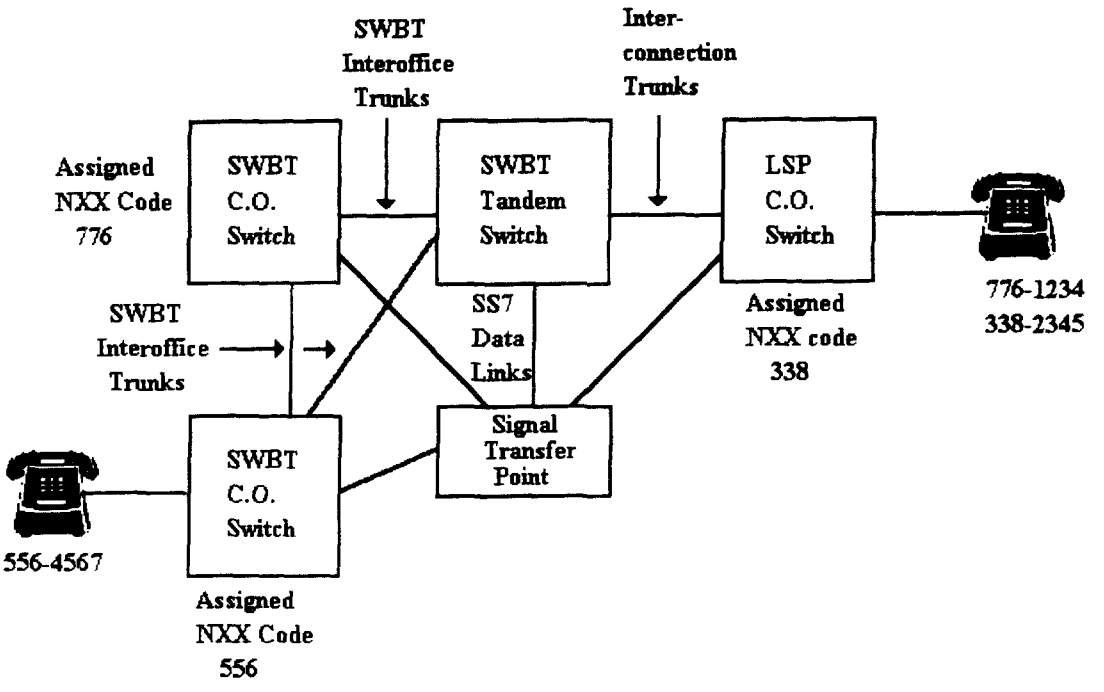
160. INP-Direct uses Direct Inward Dialing (DID) technology. With this option, all calls directed to telephone numbers assigned to a SWBT switch are sent to that switch. If a called number is assigned the INP-Direct service option, the call is routed to a trunk group that connects to the CLEC switch. The dialed digits and the call are transmitted on the trunk group to the CLEC switch and the CLEC switch determines what new telephone number has been assigned to the customer. The call is then completed to this new telephone number by the CLEC switch.

161. The diagram below will illustrate INP-Remote call flow:



162. A SWBT customer served from the same switch that the CLEC customer was served from before changing service providers would dial 776-1234. The SWBT switch would determine that the 776 NXX code is assigned to it and attempt to complete the call. The switch translations would indicate that 776-1234 is assigned the INP-Remote service option, and would determine the new telephone number assigned to the called customer by the CLEC (338-2345). The SWBT switch would transmit the new telephone number and the calling telephone number and an idle trunk number on a SS7 data link to the Signal Transfer Point (STP). The STP will transmit the same information to the tandem switch. The tandem switch will make a connection to the idle trunk from the SWBT central office and send an idle trunk number and the calling and called telephone number to the STP which transmits this information to the CLEC switch. The CLEC switch recognizes that the 338 NXX code is one that is assigned to it and connects the designated trunk and completes the call to a line assigned the telephone number 338-2345.

163. The diagram below has been modified to show the call flow for INP-Remote from a different SWBT central office:

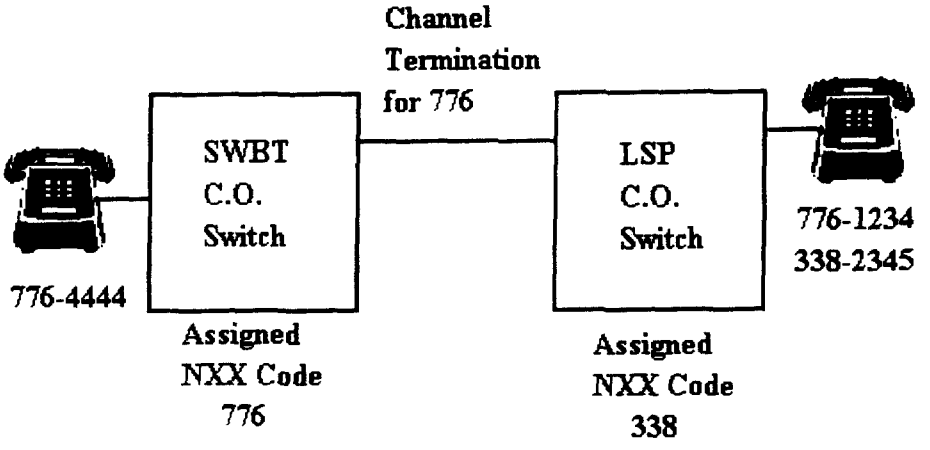


164. In this example, the call originates in the SWBT switch that is assigned the 556 NXX code. When the customer dials 776-1234, the 556 central office determines from routing tables that the call should be sent over a trunk group to the 776 central office. Using the SS7 data links and the STP, the call is transmitted to the office assigned the 776 NXX code. At that point the call flow is the same as that described for a call that originates in the 776 central office.

165. If the 556 central office does not have direct trunks to the 776 central office, the call will be routed via the tandem to the 776 central office.

166. All SWBT switches in Oklahoma are capable of providing INP-Remote service.

167. The following diagram illustrates a simple arrangement of INP-Direct where telephone numbers of only a single SWBT central office are sent to a CLEC's switch:



168. A SWBT customer served by the central office assigned the 776 NXX code dials the telephone number 776-1234. The SWBT central office switch recognizes the telephone number as one that is assigned to it and attempts to complete the call. In its memory, the switch finds a route index that directs it to route the call to a trunk group that is dedicated to INP-Direct traffic from this office. The call is transmitted onto that trunk group along with the seven-digit telephone number that was dialed by the originating caller. The CLEC switch converts that dialed telephone number into a telephone number that is located in the CLEC switch and completes the call.

169. Calls that originate from other SWBT central offices or long distance calls are routed to the SWBT 776 central office over the SWBT switched telephone network and then completed as described above.

170. Interim Number Portability ("INP") is being provided as a transitional service until long-term database number portability is deployed. In its First Report and Order on Number Portability, the FCC found that RCF and DID are the only currently technically feasible methods of providing interim number portability. (STC Appendix PORT) In the AT&T arbitration cases, (PUD 96000218 and 97000175) AT&T requested Route Index Portability